

Harworth Group

Draft GMSF Policy GM Allocation 6 West of Wingates / M61 Junction 6

Supporting Information

Ref. JM_SI_001



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LIMITATIONS

The assessments and interpretation have been made in line with legislation and guidelines in force at the time of writing, representing best practice at that time.

All of the comments and opinions contained in this report, including any conclusions, are based on the information obtained by Johnson Mowat Planning Limited during our investigations.

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1.0 INTRODUCTION

- 1.1 This document sets out information prepared by Harworth Group to assist officers of Bolton Council and the Greater Manchester Combined Authority in assessment and justification of the prospective allocation of land 'West of Wingates / M61 junction 6' (ref. GM Allocation 6) in the emerging Greater Manchester Spatial Framework.
- 1.2 The information is intended to assist in demonstrating the suitability, deliverability and viability of development in conformity to an allocation, thereby forming part of the evidence base in support of the allocation.
- 1.3 Context of the prospective allocation site and the boundaries for allocation proposed by Harworth are provided in Section 2.
- 1.4 A brief context of the development requirement and benefits is provided in Section 3.
- 1.5 Given that the prospective boundaries of any allocation are not yet confirmed, the matter of the relationship between allocated land and the surrounding Green Belt land is discussed in Section 4.
- 1.6 'High-level' work undertaken by Harworth Group in relation to key environmental and technical factors is summarised in Section 5, which demonstrates that there are no factors that may be foreseen to prevent development coming forward.
- 1.7 The viability and deliverability of development is discussed in Section 6, which informs the conclusion that development of land pursuant to an allocation for employment uses is considered to be viable and deliverable.



Introduction to Harworth Group

- 1.8 Harworth Group plc is a leading land regeneration and property investment specialist which owns, develops and manages a portfolio of approximately 21,500 acres on around 120 sites located throughout the Midlands and North of England. The company specialises in the regeneration of former coalfield and brownfield land into employment areas and new residential developments. Its flagship developments, including Waverley in Rotherham and Logistics North in Bolton, are leading examples of industrial regeneration.
- 1.9 Logistics North is the biggest development of its type being brought forward in the North West of England. The scheme will deliver over four million sq ft of bespoke industrial buildings in a range of sizes.
- 1.10 Through the planning process, Harworth Group has transformed the former Cutacre surface mine into a major new manufacturing and logistics site. The new site offers significant opportunities for commercial occupiers in an area with immediate access to the M61 and a skilled local workforce.
- 1.11 Since Harworth Group received outline planning consent for the site for 4m sq ft of commercial space in April 2014, Harworth Group has focused on completing all on and off-site infrastructure to open up the entire 250-acre development platform, whilst also completing a 550-acre Country Park that surrounds the site.
- 1.12 This has led to a range of local and international firms opting to move to the site to improve the efficiency of their operations. Aldi, Amazon, Whistl, MBDA, Komatsu and Lidl have all made multimillion pound investments into the site over the past four years, with over 5,500 staff already employed on-site. Over three million sq ft of new commercial space has already been built or is committed to be built, emphasising its position as the North West's premier logistics and distribution location. Logistics North will also add over £300 million of Gross Value Added to the local economy once fully developed, whilst delivering up to 7,000 jobs.
- 1.13 In light of the demand experienced at Logistics North and the successful delivery of the development, Harworth has sought outline planning permission for one million sq ft of employment development on its land adjacent to the Wingates Industrial Estate and within the prospective GM Allocation 6 'West of Wingates / M61 Junction 6' site.



Bolton Council resolved to grant outline planning permission for this development, subject to Section 106 agreement and referral to the Secretary of State, on 16 January 2020.



2.0 SITE CONTEXT

Strategic Location

- 2.1 Land west of Wingates and in the vicinity of junction 6 of the M61 motorway constitutes a strategic location for development of an employment site given the following key factors.
- 2.2 The location is directly accessible to the motorway network and is therefore attractive to industrial and logistics businesses that depend upon the efficient movement of goods by road. Such businesses do not invest in locations that are not accessible to the strategic road network.
- 2.3 The location is ideally situated to serve the northwest quadrant of Greater Manchester, whilst providing regional connectivity to the north and south via the M6 and to the east and west via M62, which are readily accessible via the M61.
- 2.4 Besides this, the location's close proximity to the motorway network helps to minimise the extent of the local road network used by goods vehicles. There are no shopping streets, schools or major residential areas between the draft allocation site and the motorway junction. As discussed across this report, an optimised site boundary and masterplan would be able to create a direct access to De Havilland Way (and essentially the motorway junction) and thereby remove goods vehicle traffic from the A6 Chorley Road between De Havilland Way and Wingates/Westhoughton.
- 2.5 The location is in close proximity to towns and urban areas within Bolton and Wigan districts, thereby ensuring that employment opportunities created are accessible to local people. Whilst the location benefits from a good level of public transport service this would be able to be significantly improved as part of any allocation and development.
- 2.6 This strategic location is recognised in the emerging GMSF by the identification of the 'Wigan-Bolton Growth Corridor' and the draft allocation 'GM Allocation 6 – West of Wingates / M61 Junction 6'.



Land Ownership

- 2.7 Harworth Group's landholding in the area west of the Wingates Industrial Estates originates from its legacy as a division of UK Coal, which owned land in relation to past coal mining activity. This 'legacy land' makes up an element of the site and formed the basis of Harworth's representations to the original consultation on the Greater Manchester Spatial Framework in 2016.
- 2.8 Given the strategic location of the site (i.e. accessible to the motorway network and in close proximity to urban areas), Harworth has supported the principle of an employment land allocation in this location.
- 2.9 In addition to its land holdings in this broad area, Harworth has option and clawback agreements on further land parcels both under the terms of its previous sale of land parcels and the prospective acquisition of additional land.
- 2.10 Equally, there are parcels of land within this area that Harworth has no ownership or contractual rights over. Following initial draft publication of the GMSF, incorporating the draft allocation of land in this location (West of Wingates / M61 Junction 6), Harworth sought to engage with third-party landowners in this area, but was unable to come to any agreement regarding the acquisition and promotion of land for development.
- 2.11 Consequently, the areas of land beyond that owned or controlled by Harworth and should be considered more difficult to deliver, in the context of the wider allocation and as part of a Harworth-led development.

Site / Prospective Allocation Boundaries

- 2.12 The land area proposed by Harworth for prospective GMSF allocation has been subject to detailed review and technical work and the area presented is defined by boundaries which are necessary to optimise the relationship between the development area created, access to existing and proposed strategic infrastructure, the site's topography and physical features, and the requirements of national planning policy in relation to Green Belt boundaries.
- 2.13 These proposed boundaries are a refinement of the conceptual boundaries suggested in Harworth's representations submitted to the GMSF consultation in March 2019; and



are intended to enhance the deliverability and resultant benefits of the development without increasing the loss of Green Belt land.

- 2.14 The suggested allocation site boundaries are shown on the image below and the Harworth 'Proposed Allocation Boundary' plan which is provided as Appendix 1, and then described in the following paragraphs.
- 2.15 These boundaries define a site of 181ha which is smaller than the 184ha extent of the draft GM-Allocation 6.



Figure 1 - Harworth Proposed Allocation Boundary



East Boundary / Wingates Industrial Estate

2.16 The east boundary of any allocated area is proposed to be the existing Wingates Industrial Estate. This allows development to form a continuation of an existing employment area and optimise use of existing infrastructure e.g. for initial road access and utilities.



Northeast Boundary / Chorley Road

2.17 The northeast boundary of any allocated area is proposed to be the A6 Chorley Road, adjusted as appropriate to accommodate existing development and designations to the south side of Chorley Road. This boundary allows direct access between the development area and the main road network. The road would thereafter become the boundary of the Green Belt to the northeast.



2.18 The length of this boundary is proposed to extend in a northwest direction as far as Brinsop Hall Lane approximately 250m northwest of the A6 Chorley Road / De Havilland Way roundabout. This extension of the boundary (beyond that of the draft GMSF allocation) is required to allow creation of a direct access to the roundabout and thereby serve employment development without dependency upon the existing local road network as well as to facilitate development in a strategically attractive location.





Northwest Boundary / Brinsop Hall Lane

2.19 The northwest boundary of the allocation site proposed by Harworth is to be Brinsop Hall Lane, with its border hedgerow and mature trees retained to form a landscape feature that defines the perimeter of the site. At Brinsop Hall the suggested allocation boundary abuts the southeast boundary of the existing farm yard area, and beyond this follow an existing farm track in southwest direction to the disused railway line. This proposed boundary is therefore formed entirely of physical features that are readily recognisable and likely to be permanent, and which may be supplemented by additional structural landscape planting and boundary treatments.



Southwest Boundary / Disused Railway Line

2.20 The southwest boundary at this northwest part of the allocation site proposed by Harworth is formed by the disused railway line and associated trees and hedgerows. Again, this proposed boundary is formed of a physical feature that is readily recognisable and likely to be permanent, which would also be supplemented by additional structural landscape planting and boundary treatments.





Dicconson Lane

- 2.21 At Dicconson Lane the boundary of the allocation site proposed by Harworth is to run behind the houses and gardens, thereby excluding these residential properties from any allocation for employment development. It is proposed that a substantial landscape buffer strip (of c.100m depth) is then retained behind these gardens, which may incorporate new landscape features and planting for the benefit of visual screening, biodiversity and public access/amenity.
- 2.22 Opposite the existing houses on the north side of Dicconson Lane, the allocation boundary suggested by Harworth is proposed to follow the south flank of Dicconson Lane in a southwest direction to the point where it will run behind the existing terrace of houses at the former railway line. A further landscape buffer strip of approximately 100m in depth is proposed to be created at the south side of Dicconson Lane.



- 2.23 Whilst the proposed boundary for the employment allocation is planned to exclude the existing houses to Dicconson Lane, it is suggested that the revised Green Belt boundary will follow the disused railway line across Dicconson Lane.
- 2.24 South of Dicconson Lane, the suggested allocation boundary is proposed to follow the disused railway line for approximately 350m. The boundary is then proposed to follow a watercourse and belt of trees in an easterly and then southeasterly direction around Radcliffe House Farm. The proposed boundary then follows existing tree belts and field boundaries / farm tracks to the northeast point of an existing belt of trees. These



boundaries are formed of a physical feature that are readily recognisable and likely to be permanent, and which may also be supplemented by additional structural landscape planting and boundary treatments.



2.25 The field boundaries to be retained and form the perimeter of the allocation site in this location are long-standing boundaries clearly visible on historic maps. To the southeast of this point, however the historic field boundaries have been removed to form the field pattern existing at present. It is therefore suggested that the boundaries of the allocation site proposed by Harworth is aligned to the historic field boundaries and an existing copse of trees. The historic field boundaries would be reinstated and supplemented by additional hedgerow and structural landscape planting.



South Boundary / Golf Course

2.26 Beyond this point, the proposed boundary follows the existing northern boundary of the Westhoughton Golf Club golf course to the southwest extent of the Wingates Industrial Estate. Again, these boundaries are formed of physical features that are readily recognisable and likely to be permanent.





3.0 DEVELOPMENT CONTEXT

Development Need / Market Demand

- 3.1 This information is to support a prospective strategic allocation of land for future employment development. It is not seeking to support a current development proposal or a planning application.
- 3.2 It is not therefore intended to provide evidence of latent or pent-up demand for the immediate development and occupation of business premises as the reason for allocation. A strategic allocation is intended to provide a longer-term supply of land for employment development as needed to meet current and future demand, support economic growth and realises socio-economic improvements.
- 3.3 The evidence on the need for a strategic employment allocation is that prepared by the GMCA in support of the draft GMSF, in particular the following documents:
 - GMSF Employment Land Topic Paper (2019)
 - Greater Manchester Strategy (2018)
 - Greater Manchester Employment Land Demand Statement (2018)
 - Greater Manchester Employment Land Supply Statement (2019)
 - Greater Manchester Open Data Infrastructure Map (GMODIN)
 - Bolton 2017/18 Employment Land Update (2019)
- 3.4 The evidence base (including Bolton Council's own latest monitoring information) clearly demonstrates a current and impending shortage in the supply of employment land. In particular, any land which is able to accommodate development of the type to meet modern industrial and warehouse business requirements in strategic locations.
- 3.5 The evidence base concludes that to meet this qualitative and quantitative requirement, additional land beyond that already developed and in the urban area is required. Assessment of all options and locations has concluded that the release of Green Belt land is necessary, particularly to promote growth and activity across north Manchester.
- 3.6 This underpins the targets, objectives, policy and allocations set out in the GMSF which support long term economic growth, including the identified requirement to provide *'at*



least 4,220,000 sqm of new industrial and warehousing floorspace over the period 2018-2037' (draft Policy GM-P4), which is intended to be achieved by:

- providing a high level of choice and flexibility;
- making the most of the key locations identified; and
- significantly increasing the supply of high-quality sites across the northern parts of Greater Manchester.
- 3.7 The Wigan-Bolton Growth Corridor is identified specifically to ensure that there are significant investment opportunities across the northwest of Greater Manchester, helping to boost the competitiveness of all parts of the north. Accordingly, draft Policy GM-Strat 8 identifies a requirement for land to accommodate around 798,000 sqm of new employment floorspace in this area.
- 3.8 The provision of an industrial and warehousing supply that reflects the need to compete for investment and provide choice and flexibility to meet business needs will help Greater Manchester to maximise its ability to attract and retain businesses and support its long-term economic growth prospects and the availability of local jobs.
- 3.9 New sites are important in enabling the relocation and expansion of existing businesses as well as attracting new investment into the sub-region.
- 3.10 The conclusions of the evidence base are further substantiated by the significant investment made by Harworth Group in preparing and submitting a planning application¹ for c.100,000 sqm of employment development within the extent of this prospective allocation site. Harworth Group would not do this without sufficient confidence in the need for the development and demand by business to occupy premises developed.
- 3.11 Following the substantial completion of Logistics North (i.e. all major plots completed or sold to occupier businesses), Harworth Group has received numerous enquiries and expressions of interest from major occupier businesses with significant expansion or inward investment requirements in this area. Whilst Harworth has progressed discussions with such interested parties, it has not been possible to progress towards

¹ Bolton Council resolved to grant outline planning permission subject to Section 106 Agreement and referral to the Secretary of State on 16 January 2020



commitment and development as potentially suitable sites do not have sufficient certainty in planning terms.

- 3.12 Essentially the lack of suitable sites allocated (or approved) for employment development is a key reason why businesses seeking to expand, modernise or relocate into this area are unable to do so at present.
- 3.13 It is therefore essential that land able to deliver development plots of the necessary size and in a strategically accessible location is allocated for employment development.

Socio-Economic Benefit

- 3.14 The evidence relating to the socio-economic benefit of development is that underlying the draft GMSF, as set out above.
- 3.15 The topic paper sets out the case for exceptional circumstances with regard to the proposed release of Green Belt land. The primary reason is the *'necessity of realising the spatial strategy of the GMSF, as informed by the positive long-term outcomes of the Greater Manchester Strategy'*.
- 3.16 The following specific reasons are related to the identification of land for employment development:
 - The objectively assessed needs for employment cannot be met by the baseline employment supply if a flexibility of choice is to be realised, and the only opportunities to increase Greater Manchester's GVA for the economy and address economic disparities are located within the Green Belt
 - The selected strategic locations and allocations in the Green Belt are well served by public transport, take advantage of key assets, maximise economic opportunities which have significant capacity to deliver transformational change, deliver inclusive growth, support town centres and have a significant impact on their regeneration, deliver long-term sustainable travel options and enable significant wider community benefits
- 3.17 Assessments undertaken by Harworth in support of the planning application for c.100,000 sqm of employment development within the extent of this prospective allocation site indicate that the site is accessible to areas of both Bolton and Wigan



which are affected deprivation relating to employment, skills and health as summarised below.

- The working age proportion of the population of both boroughs is below that of Greater Manchester and the national average. In both boroughs, this proportion has fallen each year over the past decade.
- The unemployment rate in Bolton is significantly above that of Greater Manchester, the North West and Great Britain. Corresponding to this, the proportion of Bolton's working age population in employment is markedly lower than in these benchmark areas.
- Bolton has a significantly greater proportion of its working age population with no qualifications than the benchmark areas of Greater Manchester, the North West and Great Britain.
- Areas of significant deprivation, particularly in and around central Bolton and Wigan which are amongst the 10% and 20% most deprived nationally.
- Health Impact Assessment (for the proposed development) identifies strong links between poor mental health and unemployment in both Bolton and Wigan.
- 3.18 These factors of deprivation and health can be addressed (in part) by new development which facilitates inward investment, business modernisation/expansion, job creation and enhanced skills/training opportunities.
- 3.19 Clearly a development of the scale that could be delivered from an allocation of the size being considered at the West of Wingates strategic location would create a very large number of employment opportunities and scale of financial investment, with a commensurate level of local/regional economic benefit and socio-economic improvement.
- 3.20 By extrapolation of the estimates made in relation to the current planning application (referenced above) it is anticipated that development across the allocation site could deliver the socio-economic benefits of the approximate scale outlined below.



	Estimate for Application (approx.)	Extrapolated for Allocation (approx.)
Employment Floorspace	Up to 100,000 sqm	Up to 400,000 sqm
Estimated Occupier Jobs	1,500	6,000
Estimated Supply Chain & Income Multiplier Jobs	400	1,600
Estimated Annual Contribution to Economy (Gross Value Added)	£100 million	£400 million
Estimated Construction Cost	£85 million	£340 million
Estimated Annual Business Rates Retention	£3 million	£12 million

Table 3.1 – Approximate scale of socio-economic benefits

Development Proposed

- 3.21 In light of the above demand and benefits, Harworth anticipates bringing forward an employment development in accordance with the site allocation and policy wording.
- 3.22 Harworth's representations to the GMSF consultation in March 2019 proposed relatively minor amendments to the wording of draft Policy 'GM Allocation 6 West of Wingates / M61 Junction 6'. These proposed that the first part of that Policy, which sets out the nature of development allowed, is worded as follows:

Provide a location for around 440,000sqm B2 and B8 uses, targeting a mix of large scale distribution and advanced manufacturing uses with opportunities to accommodate small and medium sized enterprises and ancillary uses.

- 3.23 This remains the development concept that would be progressed by Harworth through any planning application pursuant to the allocation.
- 3.24 Harworth also supports policy wording that indicates that development should:
 - Be in accordance with a masterplan that identifies areas within the site which should or should not be developed
 - Ensure that good quality road access is provided, allowing for a link from the A6 to Westhoughton
 - Facilitates enhancements to the highways network and public transport



- Incorporate very high levels of landscaping, including the retention of existing woodland, hedgerows and ponds where practicable
- Fully mitigate against any flood risk
- Ensure that the integrity of the existing rights of way network is protected
- 3.25 As outlined across this report, Harworth proposes alternative boundaries for the site allocation to those forming the draft allocation in order to optimise the deliverability of the development and key infrastructure, and maximise the resultant socio-economic benefits which underpin the allocation.
- 3.26 To assist in demonstrating the deliverability of development at the site in accordance with the allocation and policy wording, Harworth has prepared a draft initial sketch masterplan for the allocation site (boundaries as proposed by Harworth). The site appraisal and principles that have informed this masterplan are provided in Appendix 2. The draft masterplan drawing is provided in Appendix 3.

Timing & Phasing

- 3.27 It is intended that the development of the allocation site will be delivered within the GMSF plan period (2018-2037). The development is anticipated to be delivered on a phased basis, with the phasing sequence and timing sufficiently flexible to ensure the development is able to respond to occupier demand.
- 3.28 It is expected that the development which is subject of a current planning application² would be the first phase of any wider development in accordance with a site allocation.

² Bolton Council resolved to grant outline planning permission subject to Section 106 Agreement and referral to the Secretary of State on 16 January 2020



4.0 GREEN BELT

- 4.1 The latest draft GMSF is based upon evidence which indicates a need to change existing Green Belt boundaries in locations across Greater Manchester to accommodate future development needs. Resultant from this, strategic locations for such changes are then identified, which include the location 'West of Wingates / M61 Junction 6'.
- 4.2 The need for change to Green Belt boundaries and strategic suitability of this location are taken as a starting point and not therefore discussed in this paper. Consideration is given, however, to the boundaries to the Green Belt which would result from the particular extent and boundaries of the employment allocation site suggested by Harworth.
- 4.3 To further assist consideration of the suggested alternative boundaries to the employment allocation, the performance of the resultant Green Belt boundary is assessed against the tests of Green Belt set out in the National Planning Policy Framework.

Current Green Belt Boundary

- 4.4 The current Green Belt boundary in this location is formed by the western edge of the Wingates Industrial Estate. Whilst this is clearly a permanent physical feature, it is a boundary formed primarily by the development which it abuts.
- 4.5 The draft GMSF is supported by a Greater Manchester Green Belt Assessment prepared by LUC in July 2016 to form a baseline assessment of the performance of Green Belt land as existing. The purpose of this evidence base document was not to assess the need for Green Belt release or to identify potentially suitable land parcels to be released. Nevertheless, the conclusions and next steps of the Assessment recognises that the review process may include recommendations for the release of existing areas of Green Belt for development in the shorter or longer term and sets out relevant considerations for potential Green Belt releases to accommodate development including the need to provide an adequate supply of land for key development types.



GMSF Draft Allocation Boundaries

- 4.6 The proposed revision to the Green Belt boundary to accommodate draft allocation 'GM Allocation 6' West of Wingates / M61 Junction 6 is formed of the A6 Chorley Road to the northeast, Dicconson Lane to the northwest, a disused railway line to the southwest and the Westhoughton Golf Club golf course to the southeast. This results in an area of 184 ha of land being removed from the Green Belt.
- 4.7 The A6 Chorley Road, Dicconson Lane and the disused railway line are readily recognisable physical features that are likely to be permanent. The boundary with the golf course is formed by field boundaries and the change in land-use/ownership.
- 4.8 Whilst these prospective boundaries therefore satisfy the requirement of paragraph 139 (part f) (see below) of the NPPF they also include elements of land which Harworth Group is not in control of (see section 2) and that is not being actively promoted.
- 4.9 Harworth is concerned that allocation of any substantial proportion of land for development that is beyond the control of a lead developer is likely to frustrate or prevent delivery of a comprehensive and cohesive scheme within the allocation area. It risks parts of the allocated area being proposed in due course for potentially unsuitable or incompatible uses, or development failing to be sufficiently coordinated to ensure effective phased delivery and provision of necessary infrastructure. Harworth is therefore proposing an alternative boundary to remove this uncertainty

Suggested Alternative Boundaries

- 4.10 The alternative boundaries to the Green Belt that would result from the alternative employment allocation site suggested by Harworth are described fully in section 2. These will result in an area of 181 ha of land being removed from the Green Belt, representing a difference of 3 ha / 1.7% from the draft GMSF change.
- 4.11 In summary, the existing Green Belt boundary formed by the western extent of the Wingates Industrial Estate will be replaced by boundaries formed by the A6 Chorley Road to the northeast, Brinsop Hall Lane to the northwest, the disused railway line to the southwest and a series of existing tree belts, field boundaries and golf course boundary to the southwest and south.



- 4.12 A small proportion (c.500m / 6%) of the new boundary is proposed to follow a currently unmarked alignment through the body of a large agricultural field. In this location there is a lack of existing landscape features and boundaries which has resulted from the previous removal to create a larger field, which a review of historic mapping suggests may have taken place in the early 2000s. It is therefore proposed that these former field boundaries are reinstated and used to form the boundary of the Green Belt in this part of the site.
- 4.13 With the exception of the small proportion described above, the Green Belt boundaries which result from the employment allocation proposed by Harworth are all formed of physical features that are readily recognisable and likely to be permanent as suggested by paragraph 139(f) of the NPPF.

NPPF Principles and Tests

4.14 Paragraph 138 of the framework sets a number of principles for consideration in siting of development and the defining of Green Belt boundaries. It states:

"When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land."

4.15 These considerations are not particular to the precise boundaries of an allocation and resultant change to the Green Belt, rather they are relevant to the location and quantum of land to be allocated. We consider that these matters have been fully considered in the preparation of the draft GMSF and the resultant proposed allocation of land West of Wingates / M61 Junction 6 for employment uses of a substantial scale in a strategic location.



- 4.16 The Green Belt boundary to result from the area proposed by Harworth for employment allocation therefore satisfies these principles in the same way. Besides this, it is considered that the revised boundary suggested by Harworth can facilitate greater compensatory improvements to the environmental quality and accessibility of remaining Green Belt land given the wider extent of land owned by Harworth which is proposed to remain as Green Belt.
- 4.17 In particular, this is land beyond the proposed southwest boundary of the suggested allocation site as described in section 2, which is in Harworth's ownership and proposed to remain as Green Belt. This land is largely in use for agriculture and horse grazing and may therefore be enhanced to improve public access (i.e. paths and connectivity) and planting for habitats and biodiversity.
- 4.18 Paragraph 139 of the framework provides guidance on defining Green Belt boundaries.It states that:

When defining Green Belt boundaries, plans should:

- a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;
- b) not include land which it is unnecessary to keep permanently open;
- where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.
- 4.19 The alternative boundaries of the Green Belt as required to accommodate the employment allocation area proposed by Harworth are considered to satisfy these principles as set out below.



	Policy	Response
139(a)	Ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development	The purpose of the change to Green Belt boundaries in this location (irrespective of the particular alignment of those boundaries) is to facilitate development in accordance with the strategy of the GMSF. This constitutes sustainable development for employment uses of the nature proposed given the access to the strategic road network and proximity to urban areas.
		The alternative boundaries as proposed by Harworth enhance the sustainability of the development and its ability to meet identified need by facilitating direct access to the strategic road network at the A6 Chorley Road / De Havilland Way roundabout, thereby minimising the use of the local road network.
		Careful consideration of boundary alignment allows existing natural features to define the boundary and form the basis for structural landscape planting to enhance the sustainability of development.
139(b)	Not include land which it is unnecessary to keep permanently open	The revisions to the Green Belt boundaries proposed by Harworth do not result in land being included within the Green Belt that is unnecessary to keep permanently open.
139(c)	Where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period	Given the objective to deliver development across the proposed employment allocation site within the GMSF plan period (2018-37), it is not considered appropriate to identify safeguarded land in this location. In particular, the northwest parcel of land as Harworth proposes is allocated for employment development is necessary to deliver the road infrastructure improvements.
139(d)	Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development	Not applicable
139(e)	Be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period	Whilst not directly relevant to the particular alignment of boundaries around the allocation, it is evident that the GMSF takes a long-term view on the redefining of Green Belt boundaries where necessary, by allocating sufficient land to meet, and to some degree exceed, the development need over the plan period. This should help ensure that Green Belt boundaries do not need subsequent alteration.
139(f)	Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent	As fully described in section 2, the alternative Green Belt boundaries proposed by Harworth are clearly defined using physical features that are readily recognisable and likely to be permanent.

Table 4.1 – Assessment against NPPF paragraph 139 items



- 4.20 It is now considered whether the extent and nature of Green Belt land remaining around the alternative area of employment allocation proposed by Harworth continues to meet the five purposes of Green Belt as set out in paragraph 134 of the NPPF. Given the land is an established location of Green Belt, we do not contend that it currently fails to serve these purposes, rather that its alternative designation would not cause the remaining Green Belt in this location to fail to serve the purposes.
- 4.21 The five purposes of Green Belt are:
 - a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 4.22 Given that the change to the Green Belt boundary is to accommodate a strategic allocation of land, the key consideration is whether the Green Belt as remaining satisfies the above tests, not whether the land proposed to be allocated (i.e. removed from Green Belt) itself meets the purposes. This should not be confused with the justification of a development proposal within the Green Belt on the basis that the particular form and features of the land in question do not serve the purposes of Green Belt.
- 4.23 The ability of the remaining Green Belt land around the proposed allocation to serve the purposes of Green Belt is assessed in the table below.

	Policy	Response
a)	Check unrestricted sprawl of large built-up areas	The remaining Green Belt would continue to effectively check the potential for 'unrestricted sprawl' of large built-up areas, in particular the city of Manchester/Salford and, to a lesser degree, the town of Bolton.
		The existing none-Green Belt areas of Westhoughton, Aspull, Blackrod and Lostock are not themselves considered to be 'large built-up areas' in the context of this purpose.
		In accordance with the draft allocation policy, any development would be delivered in conformity to a masterplan including undeveloped areas, thereby



		ensuring that the nature of development coming forward is not perceived as urban sprawl.
b)	Prevent neighbouring towns merging	The remaining Green Belt in the vicinity of the allocation site as proposed by Harworth will continue to serve to prevent neighbouring towns from merging.
		The proposed allocation area is contiguous with Westhoughton and remains separated from the none- Green Belt areas of Aspull and Lostock by at least 1km of Green Belt land.
c)	Assist in safeguarding the countryside from encroachment	The remaining Green Belt in the vicinity of the allocation site will continue to assist in safeguarding the countryside from encroachment.
		In accordance with the draft allocation policy, any development would be delivered in conformity to a masterplan including undeveloped areas and structural landscape planting etc, thereby ensuring that the nature of development coming forward is not perceived as an encroachment into the countryside.
d)	Preserve the setting and special character of historic towns	In the context of this purpose, Westhoughton is not considered to be a historic town that has a particular setting or special character that is preserved by the surrounding Green Belt.
		Whilst there are historic elements within Westhoughton, the town largely comprises mid-late twentieth century housing estates and industrial areas.
		Consequently, the change to the Green Belt boundary to accommodate an employment allocation as proposed by Harworth would have no bearing on the preservation of the setting and special character of any historic towns.
e)	Assist in urban regeneration by encouraging the recycling of derelict and other urban land	At a macro level the Greater Manchester Green Belt will inherently continue to serve this purpose.
		As discussed above, this proposed change to Green Belt boundaries is necessary to accommodate a strategic employment allocation needed to meet an identified need for employment land of a scale, type and location that is not achievable by the recycling of derelict and other urban land.
		In Bolton, the strategic allocation of employment land of a scale and location to attract business investment and development directly serves to facilitate the recycling of urban land of a type not suited to modern business needs by redevelopment of such areas to meet housing need.

Table 4.2 – Assessment against NPPF paragraph 134 / purposes of Green Belt

4.24 It is therefore concluded that the alteration to Green Belt boundaries to accommodate the allocation of employment land as proposed by Harworth results in the surrounding Green Belt remaining able to serve all relevant purposes of Green Belt.



4.25 There are not therefore considered to be any reasons why this site does not satisfy national planning policy relevant to prospective changes to the Green Belt boundary.



5.0 ENVIRONMENTAL & TECHNICAL MATTERS

5.1 This section summarises known information across a range of relevant environmental and technical matters to assess whether there may be factors which could affect the feasibility or deliverability of development across the prospective allocation area.

Landform & Ground Conditions

Topography





Figure 2 - Site Topography (boundary indicative only)

- 5.3 This indicates that the site slopes at relatively gentle gradients (approx. 3%) from a high point near to Chorley Road at Four Gates (approx. 138m) down towards the south and west (approx. 105m).
- 5.4 Given the slope of the land and the requirement for flat development platforms groundworks including 'cut and fill' will be necessary within the site.



Geology

- 5.5 Geological mapping for this area shows that the superficial deposits comprise glacial till (mainly clay with silt and gravel), with small areas of glaciofluvial sand and gravel.
- 5.6 The bedrock geology beneath the site and the wider area is the Pennine Lower Coal Measures. This formation comprises mudstone, siltstone and sandstone with coal seams. Ravenhead rock (sandstone unit) and Cannel rock (sandstone) are also present in some areas of the site beneath the superficial units.

Coal Mining & Landfill

- 5.7 Made ground is known to be present across some parts of the site as a result of landfilling and mining activities at the site.
- 5.8 Underground coal mining is understood to have occurred in this location until the 1930s (approx.), with known mine entries within the site boundary and the potential for shallow mine workings. Given the mining history of the site, there is potential for the presence of ground gases.
- 5.9 There is evidence of historical landfill sites within the site boundary. There are a number of other areas of filled land across the site (filled ponds).
- 5.10 Further investigation is required to fully ascertain the location and extent of the former coal mining activity, land fill activity and associated risks across the proposed allocation site.
- 5.11 The identified constraints and risks are considered to be typical of development sites in former mining areas. Harworth Group is specialist in the remediation and development of former mining sites having previously been part of the UK Coal business.
- 5.12 There is no indication that matters relating to the landform or ground conditions could impose a significant constraint on the feasibility or deliverability of development.



Drainage & Flood Risk

- 5.13 The site comprises greenfield land which is currently worked for agricultural purposes. Typically, there is a network of ditch courses and a number of ponds of relatively small size throughout the site which serve to provide natural land drainage. Due to the topography of the site the south eastern part generally falls and drains toward the Marsh Brook, which flows in a southerly direction approximately 1.4km to the south west of the site. The north western part of the site drains into the Borsdane Brook which is located to the west of the site and also flows in a southerly direction through Borsdane Wood.
- 5.14 Both watercourses fall within the contributing catchment of the Glaze Brook which confluences with the Manchester Ship Canal within the village of Cadishead, approximately 16.9km to the south east of the site.

Fluvial and Surface Water Flood Risk

- 5.15 The site is located wholly within Flood Zone 1, and is therefore considered to be at 'Low' risk of fluvial flooding. The NPPF advises that areas within Flood Zone 1 are sequentially preferable for all types of development.
- 5.16 Long term flood risk mapping identifies the site to contain areas that are likely to experience risk of surface water flooding as shown in Figure 3 (below).
- 5.17 These areas of surface water flood risk are predictably associated with ditchcourses and local ponds located throughout the site where there are natural valley lines and topographical depressions present.
- 5.18 Any development will maintain and/or recreate significant ditchcourses that effectively regulate the local drainage system as a part of a sustainable surface water drainage system.
- 5.19 A Flood Risk Assessment and Drainage Strategy for any proposed development will assess the flood risk to the site and ensure that development does not increase the level of flood risk locally and to neighbouring properties.
- 5.20 The Drainage Strategy for the site will seek to manage surface water runoff in a sustainable manner, mimicking and integrating the local natural drainage regime as



closely as possible. Runoff rates leaving the site will not exceed pre-developed (greenfield) rates by incorporating source control techniques and Sustainable Drainage Systems (SuDS). These will be designed to a level that will accommodate the effects of climate change, ensuring that the development and neighbouring properties will remain safe from flood risk for the lifetime of the development.

5.21 Similar to Harworth's development at Logistics North, it is anticipated that the surface water drainage from the development will be attenuated using ponds (as part of the sustainable drainage system) which present ecological and amenity opportunities as well as mitigating flood risk. It is anticipated that the on-going management and maintenance of the SuDS system will be funded by the development in the same manner as occurs at Logistics North.







Other Sources of Flooding

5.22 A desk top review of other sources of flooding, including groundwater, reservoir flooding, canals and drainage infrastructure has concluded that there are no other sources of flooding to affect the site itself.

Water Resources

- 5.23 A review of British Geological Survey (BGS) maps show the ground conditions to be of generally low permeability, comprising Pennine Lower Coal Measures Formation (mudstone and siltstones). EA mapping shows this underlying bedrock to be classified as a Secondary A aquifer, which has the potential to yield limited amounts of groundwater, capable of supporting water supply and base flows to watercourses on a local scale. No abstraction points of significance have been identified due to the absence of Groundwater Source Protection Zones in the local area according to EA mapping. Ground conditions generally infer that there is limited potential for infiltration and a soakaway based surface water drainage system unfeasible.
- 5.24 The application site falls within the EA's Lower Mersey and Alt Catchment. The Abstraction Licencing Strategy (ALS) for the Lower Mersey and Alt catchment (Environment Agency, February 2013) sets out how much water is available for abstraction and which areas or units are under stress i.e. cannot support further ground or surface water abstraction without having an adverse impact on local biodiversity. The ALS mapping shows that the site to fall within a water resource management unit which has water available for at least 95% of the time. As such it can be concluded that development of the site will not have an adverse impact on local natural water resources, which is compounded by the anticipated type of development where distribution units will generate low water demand.
- 5.25 There is no indication that matters relating to the flood risk, drainage or water resources could impose a significant constraint on the feasibility or deliverability of development.

Ecology

Designated Wildlife Sites

5.26 A number of locally designated Sites of Biological Importance (SBI) are identified in the vicinity of the site, as shown on figure 4, with the closest being listed below:



- Pond of Four Gates SBI adjacent to the site at Chorley Road.
- Little Cannel Pit SBI 270m to the west
- Borsdane Wood SBI 320m to the west
- Junction 6 M61 SBI 375m to the northeast
- 5.27 Three Sites of Scientific Interest (SSSI) and twelve Local Nature Reserves (LNR), all nationally designated, are identified within 5km of the site, the closest of which is Borsdane Wood LNR located approximately 320m to the west. There are no internationally designated wildlife sites within 10km of the proposed development site.



Figure 4 - Ecological designations (boundary indicative only)

Habitats

5.28 The majority of the site is dominated by farmland, predominantly used for grazing and growing crops. A number of edge habitats are present including, but not limited to, semi-natural broad-leaved woodland, watercourses and native hedgerows, which qualify as habitats of principal importance under S41 of the NERC Act (2006).



- 5.29 The site has a variety of habitats suitable for supporting a range of plant and animal species. The habitats of highest ecological value within the site are the broad-leaved plantation woodland, the intact hedgerows and scrub, and the ponds. These areas provide varied breeding, feeding and roosting habitats for a variety of wildlife with plant species providing nectar, pollen and seeds for invertebrates, birds and mammals. The extensive areas of poor semi-improved grassland and arable farmland, small areas of amenity grassland and modified neutral grassland have limited potential for wildlife.
- 5.30 All native hedgerows are habitats of principal importance under S41 of the NERC Act (2006). Hedgerows within the site may require further assessment under the Hedgerow Regulations (1997). Hedges on site also qualify as Greater Manchester Biodiversity Action Plan (GMBAP) priority habitat.
- 5.31 The ponds and the acid grassland/heath mosaic habitat on site also qualify as S41 and GMBAP habitat.

Protected Species

- 5.32 Full habitat and (as appropriate) protected species surveys will be undertaken at the appropriate time to inform development proposals and assessment. Existing information indicates that there is potential for the site to provide habitat for the following protected species.
- 5.33 The ponds on site provide potential breeding habitat for amphibians. The areas of plantation woodland, intact hedges, scrub and semi-improved grassland offer foraging potential and refuge (excluding the grassland) for amphibians.
- 5.34 The open poor semi-improved grassland and arable fields offer limited foraging and commuting potential for bats. The plantation scrub, trees and intact hedges, particularly those bounding the site, provide good foraging and commuting potential for bats.
- 5.35 The plantation woodland, hedges, scrub and trees on site provide nesting opportunities for a range of perching birds. The open poor semi-improved grassland and arable fields also provide nesting opportunities for ground nesting farmland birds. The site also provides foraging opportunities for a range of bird species.
- 5.36 Watercourses within the site may have potential for water vole.



5.37 The key potential effects of the proposed development on local ecological features will be fully assessed to inform design of the development to avoid or minimise impact and identify opportunities for enhancement, mitigation or compensation associated with any development proposed. Land in Harworth's ownership beyond that proposed for development (including that remaining within the Green Belt) presents a valuable opportunity to deliver enhancement and mitigation within the immediate vicinity of the development site.

Landscape & Views

- 5.38 The site is in the 'Agricultural Coal Measures' Landscape Character Type and 'Blackrod/Hulton Ridge' Landscape Character Area (LCA), as defined by Bolton Council's 'A Landscape Character Appraisal of Bolton' (2001). The key features of the Blackrod/Hulton Ridge LCA are listed as:
 - Undulating topography with hills and valleys falling to the Mersey basin in the south.
 - Low grade agricultural land with ponds and flash areas.
 - Structure provided by broadleaved woodland.
 - Fragmented landscape with scattered settlements and dissecting transport links.
 - Lack of historical continuity and variety in landscape quality.
- 5.39 The site and its surroundings are not within or immediately adjacent to any national or local landscape designations.
- 5.40 Given the scale of the allocation site and nature of the development proposed, there is potential for landscape and visual effects to arise, including that which may affect:
 - Farmland within the Blackrod/Hulton Ridge LCA to the northwest of Westhoughton
 - Users of the Public Right of Way (PRoW) network within and around the site
 - Occupiers of residential and commercial properties within and around the site
 - Users of the local road network
 - Users of local sports and amenity areas (e.g. golf course)
 - Users of PRoWs and occupiers of properties on higher ground within the surrounding area


5.41 It is considered inherent to development of this strategic scale, nature and location that it will be visible and cause a change to the landscape as existing. Means of mitigating and softening this impact are to be incorporated in the masterplanning process, including the retention and creation of buffer strips, amenity areas and screen planting.

Heritage & Archaeology

5.42 There are no designated heritage assets within or adjacent to the site as proposed to be allocated by Harworth, as shown by figure 5 below. This indicates the nearest listed buildings and scheduled monuments to be 550-700m from the site boundary.



Figure 5 - Designated heritage assets (boundary indicative only)

5.43 An historic environment screening exercise has been undertaken by the GM Archaeological Advisory Service and the Centre for Applied Archaeology in relation to the allocation site boundaries proposed in the 2019 GMSF. This 'screened in' the site



for further consideration, albeit as Category 5 which is defined as sites where only nondesignated heritage assets are likely to be impacted.

- 5.44 This concluded that there are no designated heritage assets within the site, although there is potential for palaeoevironmental evidence to be recovered from the site relating to past landscape use. There is considered to be potential for Post-Medieval and Industrial archaeological remains. There is also potential for historic hedgerows.
- 5.45 Twenty-two non-designated heritage assets are listed as being within, or within 250m of, the site.
- 5.46 The following further work will be undertaken in light of the recommendations of this study across the full extent of the revised site/boundaries, including:
 - Walkover survey and assessment of potential paleoenvironmental deposits
 - Further assessment for historic hedgerows
 - Historic building assessments of the farmsteads
 - Targeted intrusive work on the possible bell pits and surrounding areas
 - Further assessment on whether Holden Wood can be designated as ancient woodland
- 5.47 The findings of the screening exercise and the further assessment work recommended will be factored into the masterplan process and be secured by conditions of any planning permission granted.

Access & Travel

Infrastructure Capacity and Traffic Generation

- 5.48 Development traffic generation, existing road infrastructure capacity and the possible requirements for infrastructure upgrade have been subject of separate assessment and engagement between specialist highways consultants acting for the GMCA (SYSTRA) and Harworth (Mosodi).
- 5.49 Development traffic generation (67% B2 and 33% B8 uses), existing/consented road infrastructure capacity and the possible requirements for infrastructure upgrade have been subject of separate assessment and engagement between specialist highways consultants acting for the GMCA (SYSTRA) and Harworth (Mosodi).



- 5.50 A robust iterative process of the impact and distribution of development flows has been undertaken where the existing/consented improvements of junctions have been modelled with the addition of the expected base traffic (with no GMSF developments) in 2025 and 2040. Further assessments have been undertaken with the addition of all prospective development associated with the GMSF and then a further sensitivity scenario with development impact assessed on a worst-case basis (known as the high scenario).
- 5.51 Throughout the iterative process, the distribution of trips has been impacted by potential mitigation measures and the crossover of impacts from adjacent GMSF Sites i.e. traffic has been redistributed to allow for increases in capacity and/or increased congestion.
- 5.52 The final run of assessments includes for a range of mitigation measures to be implemented on the network and TFGM have confirmed that the only measures which can be included must have certainty over delivery and funding within the timescales of the local plan. It should be noted that TFGM have excluded the west of Westhoughton link road from the current modelling. This provides a worst-case modelling scenario as if the scheme is implemented it would alleviate traffic from the A6 corridor, with improvements identified within this process likely to be unnecessary.
- 5.53 In order to ensure that the development can be accommodated in its current draft allocation boundary or the Harworth proposed amended boundary, the modelling completed has provided a scenario with the De Havilland Way Roundabout Spine Road Access (updated, Harworth proposed boundary) and one accessed entirely from Wimberry Hill Road (boundary contained in the draft GMSF). This provides certainty that the highway network can accommodate the allocation in either scenario.

Link Road

- 5.54 Harworth is aware that a prospective link road or bypass to the west of Westhoughton connecting the south of the town with junction 6 of the M61 has been an aspiration of the local authority for some time and is reflected in the draft wording of the GMSF site allocation GM6 (West of Wingates).
- 5.55 Whilst there are no known surveys or plans for the prospective alignment of any such link road, this would presumably run via land within or adjacent to the prospective



allocation. Any alignment would need to be configured by reconciliation of matters including topography, existing assets/features, strategic function, inter-relationship with existing network, cost/benefit and phasing/delivery timing.

- 5.56 Harworth considers that the deliverability and cost effectiveness of any such link road would be significantly enhanced if its purpose is also to serve development (as opposed to by-passing). Its strategic effectiveness will be enhanced by direct connection to the Chorley Road A6 / De Havilland Way roundabout as is facilitated by the revised site boundary as proposed by Harworth, which thereby supports the long term aspiration for a link road.
- 5.57 Harworth suggests that the masterplanning process seeks include provision for the link road on an alignment through and beyond the proposed development area. The spine road for the development is then anticipated to be delivered to a specification able to form part of and serve as the link road.
- 5.58 The delivery of the link road, that would be made substantially more viable with the development of GM6 providing a large section of this route internally, would bring enhancements to all users of the A6.
- 5.59 Removing traffic from the A6 corridor will increase the efficiency of the existing road network in terms of capacity and will serve to reduce congestion which will in turn improve air quality along this corridor reducing the number of idling vehicles at traffic signals.
- 5.60 Furthermore, the section of the A6 that was bypassed would become a more cycle friendly piece of infrastructure. The increased spare capacity at junctions could also be utilised to improve the cycling facilities along the corridor. In short, the land take currently provided to cars and HGV's along this corridor can be used to enhance sustainable travel provision which dovetails with Manchester's Bee Networks Initiative.
- 5.61 There would also be benefit to public transport journey times as reduced congestion will increase timetable reliability, thereby making bus travel more attractive which then assists with mode shift away from the car on this corridor further enhancing air quality and attractiveness of the corridor for cycling and walking.



Sustainable Travel

- 5.62 The site is accessible by public transport services via bus stops located on Chorley Road and Dicconson Lane. Any development would be expected to enhance the public transport accessibility of the site by interventions such as on-demand service provision (i.e. Local Link), increased bus service frequency and alternative routing. Discussions over the precise interventions required will be undertaken with Transport for Greater Manchester (TfGM) at the appropriate time.
- 5.63 The site is accessible on foot and by cycle via an established network of footpaths, cycle paths and other public rights of way. Any development will be expected to enhance this accessibility with the provision of new and upgraded footpaths and cycle paths within the site and the surrounding area, to a scheme agreed with the local authority. Such upgrades would also integrate with and contribute to the Greater Manchester Bee Networks initiative.
- 5.64 The site is accessible by train as part of a multi-mode trip, with the nearest stations being at Westhoughton and Horwich Parkway. As outlined above, opportunities to provide and enhance connectivity between these stations and the development site will be explored and agreed with the local authority.
- 5.65 Provisions to encourage the use low emission and electric vehicles will be incorporated into the development, such as charging points and future-proofed utility infrastructure.
- 5.66 As expected for any major development proposal, sustainable travel initiatives are expected to be implemented via Travel Plans adopted by the occupier businesses.

On-Site Infrastructure

- 5.67 A masterplan for the site will incorporate a comprehensive network access and circulate infrastructure for all users. This is expected to be formed of a primary spine road and series of spur roads that serve development plots. High quality footpaths, cycle paths and bus shelters will be incorporated.
- 5.68 The site footpaths and cycleways on site will be integrated with the existing footpath and cycle path/bridleway network around the site, thereby providing connectivity for access and amenity.



- 5.69 Through the provision of on-site infrastructure and the associated spaces and features,Haworth (as master-developer) is committed to providing a high-quality environmentwhich is inclusive for all users and serves to enhance the sustainability of development.
- 5.70 Appropriate levels of parking for HGV and passenger cars will be provided.

Off-Site Infrastructure

- 5.71 Collaborative work undertaken by Systra and Mosodi has indicated that in order to deliver the full draft allocated floor space a number of off-site junctions would require capacity improvements in the 2040 with full GMSF scenario.
- 5.72 The exact nature of these mitigation schemes would be established through an application where a refinement of the transport work would be required to support an application. The information requires updating because the baseline situation is likely to have changed somewhat by the time of an application.
- 5.73 Preliminary findings of the work undertaken to date by Systra and Mosodi indicates that to deliver a total of 440,000sqm of commercial development including the Phase 1 element of 100,000sqm the mitigation outlined in the table below would be required. It must be recognised that the mitigation schemes mitigate the impact of the whole GMSF and includes background traffic growth to 2040
 - Blackrod Road/A6;
 - A6/De Havilland Way Roundabout;
 - Dicconson Lane/A6 Signal;
 - Lostock Lane/A6;
 - Church Street/A6;
 - Bolton Road/A6;
 - Chequerbent Road;
 - J5 and J6 of M61;
 - Burden Way/De Havilland Way; and
 - Bolton Road/Hall Lane.

Amenity & Recreation

5.74 The integrity of public rights of way within and around the proposed allocation site either in their existing form and alignment (where applicable) or as redeveloped and



enhanced routes. The prospective upgrading of routes from footpaths to bridleways (where appropriate) will facilitate access by a greater range of users with different travel and mobility requirements. This increased accessibility will facilitate the use of land not proposed for development within and adjacent to the allocation site for amenity and recreational use.

5.75 Harworth aspires to create an accessible and inclusive environment within and around any development proposed. This will create a visual buffer to development; a space for wildlife and habitats; and open up recreation, health and fitness opportunities within Harworth's land ownership.

Energy & Sustainability

- 5.76 Harworth recognises that development of land and the construction and subsequent operation of premises has the potential to impact the environment through the use of resources and energy. Minimising this impact, incorporating measures to increase efficiency, utilise renewable energy and mitigate the impact of climate change is key to the development strategy.
- 5.77 Development of this prospective allocation site has the potential to be exemplar in this regard, with the adoption of innovative design, best practice and new technologies.
- 5.78 Construction and materials management plans are key to minimising the impact, and maximising the efficiency of resource and energy use during the construction phase. It is anticipated that the earthworks to create the development platforms will 'balance' on site i.e. not result in a need to import or export material.
- 5.79 Where feasible landscape buffer areas and planting will be created in the early phased development process thereby allowing planting to mature for environmental, screening and ecological benefit.
- 5.80 The design and construction of buildings will achieve a BREEAM level of 'very good' or better.
- 5.81 Renewable energy generation facilities are anticipated to be incorporated within the development, most likely in a manner integrated with the buildings (e.g. rooftop photovoltaic cells) rather than standalone energy generation infrastructure.



5.82 Further facilities will be provided to assist users of the development in minimising energy usage and carbon emissions for instance through the use of sustainable travel modes and zero/low emission vehicles.

Conclusions

5.83 The above summaries demonstrate that there are no known environmental or technical matters which could be indicate development of the prospective allocation site not to be feasible or deliverable.



6.0 VIABILITY & DELIVERABILITY

- 6.1 It is understood that consultants acting for the GMCA are undertaking assessments of viability of the prospective allocation sites. Harworth are confident that this work will demonstrate the development of the prospective allocation site to be viable in broad terms.
- 6.2 Both the technical work and land assembly work undertaken by Harworth to date have not identified any 'showstoppers' (i.e. technical constraints or significantly disproportionate costs and values) and it is therefore considered that development will be viable and deliverable during the plan period.
- 6.3 Should the work of the GMCA's consultants require input or discussion, then Harworth and its technical team members are available to discuss this at the relevant stage.
- 6.4 Overall, Harworth has a strong track record of delivering such developments in the role of master-developer and has invested substantially in this site to date. This commitment and investment is the strongest indicator of development being viable and deliverable at this site.



7.0 SUMMARY AND CONCLUSIONS

- 7.1 This document sets out initial and high-level information as presented by Harworth Group to assist in demonstrating the suitability, deliverability and viability of development in conformity to an allocation.
- 7.2 Harworth Group is the primary landowner/developer of land in the prospective allocation site GM Allocation 6 'West of Wingates / M61 Junction 6'. Harworth Group is a master-developer with relevant experience in delivering large scale employment development in strategic locations and at complex sites. Harworth Group's northwest business is based in Manchester and is highly experienced in development across Greater Manchester, including Logistics North in Bolton.
- 7.3 In investing in land and development in this location, Harworth Group demonstrates confidence in the attractiveness of the location to occupier businesses. This confidence is based upon the strategic location in relation to the motorway network, nearby industrial/commercial areas and the availability of a workforce.
- 7.4 The availability of the workforce and the demand for skills, services and supplies drives the economic growth of the area and the socio-economic benefits for local people and communities.
- 7.5 Harworth is confident that development pursuant to an allocation is viable and that high-quality development will come forward within the plan period.
- 7.6 However, the attractiveness of the development and its ability to deliver improved infrastructure depends substantially upon the extent, position and boundaries of the land area to be allocated. Harworth continues to advocate an alteration to the boundary of draft allocation GM Allocation 6 (from that included within the 2019 GMSF) to include land in its ownership, adjacent to the Chorley Road / De Havilland Way roundabout, and to exclude land to the south/southeast which is remote from existing road infrastructure.
- 7.7 The alternative boundaries proposed serve to enhance the deliverability and resultant benefits of the development whilst also reducing the area of land removed from the Green Belt.



- 7.8 Section 5 demonstrates that Harworth has a high-level understanding of the environmental and technical matters relevant to the assessment, planning and delivery of such a development. Besides this, Harworth has a detailed and comprehensive understanding of these aspects in relation to that part of the site for which outline planning permission is sought³. This initial work has identified that there are no known environmental or technical constraints to the site being suitable for a development of this magnitude and nature.
- 7.9 Further surveys and assessments will continue to be undertaken in relation to site, which will inform the masterplan and detailed design processes. Harworth will seek to retain and incorporate natural features, habitats and assets existing on site as part of the development where feasible and appropriate. Where loss is unavoidable, opportunities for mitigation, enhancement, compensation or off-setting will be incorporated.
- 7.10 As the draft sketch masterplan demonstrates, areas of the prospective allocation site are proposed not to be developed in order to protect amenity of residents, provide amenity for users of the site, retain important features and connectivity for wildlife. A comprehensive landscape planting scheme will further mitigate any landscape or visual impact.
- 7.11 Whilst the development of any such site is complex, there are no known significant impediments to the delivery of development at the site proposed for allocation by Harworth. It is considered that all environmental and technical matters are able to be addressed in a manner normal to such development.
- 7.12 Site allocation is a fundamental step towards the delivery of development and the realisation of its social, economic and environmental benefits.
- 7.13 Harworth Group has a great deal of confidence in the delivery of this development and looks forward to working closely with the relevant authorities and stakeholders through the planning process.

³ Bolton Council resolved to grant outline planning permission subject to Section 106 Agreement and referral to the Secretary of State on 16 January 2020



APPENDIX 1 – HARWORTH PROPOSED BOUNDARIES PLAN



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Notes

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APPENDIX 2 – SITE APPRAISAL & DEVELOPMENT PRINCIPLES



Site Appraisal, Constraints and Opportunities

The key opportunity at the site is its accessibility to the strategic road network. This is optimised by inclusion of the parcel of land north of Dicconson Lane to allow direct access to existing roundabout at De Havilland Way and Chorley Road.

The development objective and potential to be realised is the delivery of employment sites and premises of a range of types and sizes to attract inward investment and facilitate the growth and modernisation of existing companies, provided within a rational and attractive environment, providing amenity features and uses, and ensuring sustainability of development by avoiding, minimising and mitigating impact.

The key environmental factors considered in high-level appraisal of the site are set out in the table below.

Site Appraisal					
Topography	High point of site located in proximity to Chorley Road at Four Gates, with land falling away at relatively gentle gradients to south and west.				
Dwellings and premises	Residential houses located on Dicconson Lane and Chorley Road and farmstead-type properties located within the body of the site. Business premises to Chorley Road and at the Wingates Industrial Estate.				
Highways / access	Strategic road network access at junction 6 of M61 motorway via De Havilland Way, approx. 500m from Chorley Road A6 roundabout. Potential for direct access to De Havilland Way via Chorley Road roundabout.				
	Access to local road network via Chorley Road A6 and Dicconson Lane B5239.				
	Highway capacity understood and infrastructure upgrade proposed via current planning application.				
Rights of way / access	Public rights of way network across the site. Right of access to farmsteads via tracks.				
Agricultural land	Fields generally in arable and grazing use, with some 'open storage' occurring. Fields enlarged by removal of hedgerows in past.				
Trees and vegetation	Trees and hedgerows located across site predominantly at field boundaries and around watercourses.				
Watercourses	Small streams and drainage ditches across site.				



Habitats and species	Site of Biological Importance at Four Gates.		
	Ponds, trees, hedgerows etc potential habitat to protected and priority species.		
	Additional ecological enhancement area proposed as part of current planning application.		
Utilities / infrastructure	Location of former mineshafts known. Overhead cables crossing site.		
Former development / land uses	Greenfield site, not previously developed. Location of former mineshafts and related features known.		
Neighbouring development / land uses	Disused railway line to west/southwest. Golf course to south/southeast. Industrial estate to east.		
Strategic context	Integrate with potential highways link road / bypass project.		
	Objectives to enhance access to employment, skills, and sustainable travel accessibility.		

Table 7.1 – Site Appraisal

Scale and Uses

Development plots and premises to include flexibility to accommodate different uses, primarily storage and distribution (Class B8) and general/light industrial (Class B2 and B1c) with minority elements of office (Class B1a) and ancillary amenity uses such as food and drink (Class A3/A4/A5).

Scale of buildings to provide a broad range of floorplate sizes to meet demand of occupier businesses. The site may accommodate in the order of 25 units ranging from 1,000 sqm to 63,000 sqm in floorplate size, although configurations to suit market demand are deliverable.

Floorplate shape and height of buildings to meet occupier and institutional market requirements. Building heights anticipated to range from 10m to 25m.

Changes to existing ground levels will be required to achieve flat development platforms. Orientation of buildings to marry with core road infrastructure and minimise extent of earthworks required where possible.

Buildings to be provided with yards, car parking, ancillary features within development plot.



Connectivity

Development to provide primary access to 'A' road network as close to junction 6 of the M61 as achievable and ensuring rational and satisfactory integration with existing local highway network. Objective to ensure HGV use of local road network is minimised.

Objective to ensure compatibility with wider road infrastructure development and upgrade objectives including potential link road/bypass to west of Westhoughton. Retain flexibility to facilitate alignment of any link road through or around the development.

Ensure access to the site is achievable by pedestrians, cyclists and users of public transport, including by the provision of on-site and off-site infrastructure and upgrades.

Provide adequate HGV parking facilities or other controls to minimise occurrence and impact of HGV parking/waiting on the highway.

Access & Amenity

Ensure integrity of the public right of way network is maintained with appropriate diversion and enhancement etc. Ensure access is retained to properties and premises on site and off-site according to existing rights or other agreement.

Ensure retention of existing natural features on site and around the perimeter including tree belts, hedgerows, watercourses etc as appropriate. Include substantial landscape planting buffer strips within and to the perimeter of the development area, in particular around the residential properties on Dicconson Lane.

Where appropriate provide open space for public access and amenity within and around the development. Where appropriate retain or enhance undeveloped areas for wildlife habitats and biodiversity.

Design & Appearance

Objective to achieve high quality design of development informed by a masterplan with coherent treatment of infrastructure, public and incidental areas.

Building design to respond to investor and occupier requirements whilst maintaining high quality appearance through consistent use of materials and detailing.



Ensure that external illumination and signage serves to provide an effective operational environment, without undue light-spill to adjacent areas or longer-range visibility.

Ensure building height, position, design and appearance minimises, as appropriate, the impact on views and the wider landscape.

Ensure provision of HGV yards and access docks meets investor and occupier requirements whilst minimising potential for noise disturbance to adjacent areas. Incorporate landscape bunds and acoustic fencing where necessary to minimise impact of noise from operational areas.

Environmental Sustainability

Development to incorporate a comprehensive sustainable drainage system (SUDS) to fully attenuate surface water and maintain run-off to greenfield rates. Where appropriate the SUDS infrastructure may provide enhanced amenity and biodiversity value.

The proposed boundaries have been defined so as to allow retention of trees around the perimeter of the development area. Development masterplan to retain trees, hedgerows & watercourses within the site where possible. Development layout to incorporate biodiversity corridors and connections around existing features and habitats.

Proposed development to incorporate measures to achieve high energy efficiency standards, including through a fabric first approach and the incorporation of on-site renewable and low carbon energy generation.

Enhancement & Mitigation

Development to incorporate areas for the retention, enhancement and creation of new ecological features within the site to achieve a net gain in biodiversity.



APPENDIX 3 – MASTERPLAN



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Notes

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KEY



	(33 14 Ha / 81.90 acres, Application 04766/18) Suggested Allocation Boundary (Exact perimeter to be clarified - c.176 Ha / 435 acres)									
	(Exact perimeter to be clarified - c.176 Ha / 435 acres)									
	Link to wider connectivity									
-	Retained Tree Belts									
		New Structural Landscape Planting								
		Landscape Buffer / Public Amenity Access								
		Ecological Enhancement Existing Farmland								
		(With public access via footpaths / bridleways)								
		Proposed Link Road Route								
		Alternative Link Road Route								
		Development Parcels (incl. Amenity Uses)								
	Existing Farmsteads within proximity									
		Existing Farm	Access							
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